



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

**MEMORANDUM**

SUBJECT: Review of DuPont Comments on the Oxamyl RED Risk Assessments and Science Chapters.

FROM:

Richard E. Michell, Ph.D., Plant Pathologist  
Antimicrobials and Plant Pathogens Branch, BEAD (7503C)

Michael K. Hennessey, Ph.D. Entomologist  
Herbicide and Insecticide Branch, BEAD (7503C)

David Widawsky, Ph.D., Economist  
Economic Analysis Branch, BEAD (7503C)

TO:

Carmelita White  
Registration Branch III  
Special Review and Registration Division (7508C)

We have reviewed the comments provided by DuPont in response to their review of the oxamyl risk assessment and science chapters. The only 3 items with any relevance to BEAD's areas of expertise were:

1] [Pages 12, and 14] Comments on whether the risk assessment should use the typical (350) or upper range (1,200) of acres treated per day aerially.

2] [Page 17] What the correct maximum seasonal rate is for cotton.

3] [Page 1 of Attachment 1] The use oxamyl on pineapple in foreign countries is as a preplant application. Only a small percentage of the countries that ship fruit to the US use oxamyl on a limited basis.

BEAD's respective responses to the 3 items above are:

1] In anticipation of the possible need to verify that both these figures are reliable estimates, BEAD contacted crop specialists in AR, LA, MS, and TX, which are among the top five states applying oxamyl aerially based on total acres treated. The feedback we received indicated that the 350 and 1200 acres treated per day are reasonable estimates of the typical and upper range estimates, respectively.

2] The correct seasonal maximum application rate is 4 lbs ai/acre. This is clearly stated on the accepted label.

3] Although oxamyl is labeled for both preplant and postplant use, it is used domestically (HI, PR) as a postplant treatment during the plant and ratoon crop cycles. Unlike domestic use which can be controlled by labeling changes, oxamyl use patterns in foreign countries can not be regulated in this manner, since EPA has virtually no control over labeling available in other countries. Accordingly, where and how oxamyl is used in foreign countries is subject to change without EPA approval. Imported pineapples must only contain legal levels of oxamyl, as specified in the tolerance. Since the existing tolerance is intended to cover both preplant and postplant use, the use pattern in foreign countries could conceivably be changed to include both types of treatment without exceeding the tolerance.

We can neither confirm nor deny the extent of usage claims based upon the available information.